

ATTORNEYS AT LAW

SUITE 800 1170 PEACHTREE STREET, N.E. ATLANTA, GEORGIA 30309-7706 (404) 962-6100 Fax (404) 962-6300

Leah J. Knowlton Direct Dial (404) 962-6455

Direct Fax (404) 962-6352 lknowlton@millermartin.com

September 28, 2012

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Ms. Carol Ropski U.S. Environmental Protection Agency Superfund Division Enforcement and Compliance Assurance Branch Enforcement Services Section 1, SE-5J 77 West Jackson Boulevard Chicago, Illinois 60604-3590

> RE: South Dayton Dump and Landfill Site, Moraine, Ohio Site Spill Identification Number B52B Response to General Notice Letter

Dear Ms. Ropski:

This will acknowledge receipt of EPA's General Notice of Potential Liability letter, dated September 10, 2012, that was served upon registered agent for Coca-Cola Enterprises, Inc. on September 17, 2012. As an initial matter, please note that Coca-Cola Refreshments USA, Inc. is the proper name of the entity conducting business in the United States. The former entity, Coca-Cola Enterprises Inc., became a wholly-owned subsidiary of The Coca-Cola Company on October 1, 2010, and the name of Coca-Cola-Enterprises Inc. was changed to Coca-Cola Refreshments USA, Inc. Hereinafter, we refer to Coca-Cola Refreshments USA, Inc. by its abbreviation, "CCR" (which encompasses the entity formerly known as Coca-Cola Enterprises Inc.).

I have been authorized to respond on behalf of CCR. In its General Notice letter, EPA contends that CCR "may have owned or operated the Site or generated or transported hazardous substances that were disposed of at the Site." By separate letter of today's date, we request pursuant to the Freedom of Information Act that EPA provide any information linking CCR to this Site.

Upon receipt of EPA's letter, CCR immediately began investigating the allegations. At this time, we understand that the former Dayton Coca-Cola Bottling Company plant ceased bottling operations in the 1980's, and that neither CCR nor any corporate predecessor or affiliate has ever "owned or operated" any part of the South Dayton Dump and Landfill Site. CCR's investigation is ongoing, and, to date, there is no information indicating that the Dayton Coca-Cola Bottling plant transported to, or arranged for the disposal of hazardous substances at the Site.

Ms. Carol Ropski U.S. Environmental Protection Agency September 28, 2012 Page 2

As you may know, several PRPs who entered into a 2006 settlement agreement with EPA have filed lawsuits seeking contribution or cost recovery against numerous parties, including CCR. The Plaintiffs' lawyer in these cases, Mr. Larry Silver, provided defendants with a deposition transcript that allegedly links CCR and others to the Site. In his deposition, Mr. Edward Grillot testified that when he was a "little kid" he observed "Coca-Cola" trucks disposing of wooden cases, bottles and cartons of syrup at the Site. See Deposition of Edward Grillot, Hobart Corporation, et al. v. Waste Management of Ohio, Inc., et al. (April 24, 2012), at 114 – 115, enclosed herewith. There is no evidence that any of these materials contained hazardous substances.

Since the General Notice letter was served on CCR on September 17, 2012, and requires CCR to commit by September 28, 2012 to finance or conduct remedial work, CCR respectfully requests additional time to conduct its investigation and review documents that EPA may provide in response to our FOIA request. CCR is not refusing to cooperate with EPA, but needs more time to investigate activities at a plant that has not operated in about 25 years, and for which there are no known disposal records.

CCR and the Coca-Cola family of companies are recognized world leaders in environmental stewardship. CCR has cooperated with EPA in similar sites involving historical operations both in Ohio and around the Country. If EPA provides evidence linking CCR to hazardous substance disposal at the Site, we will respond promptly and responsibly.

Please address all further communication regarding this matter to me, and feel free to contact me if you have any questions.

Sincerely,

Leah J. Knowlton

LJK/dk

Enclosure

cc: Christopher H. Steger, Esq.

Vail T. Thorne, Esq.

Page 113				
2 Q To go to the Blaylock location? 3 A Right. 4 Q What kind of stuff didn't Blaylock 5 like that ended up where you were? 6 A Lots of cardboard. Since we had the incinerator, a lot of the skids and stuff like 7 incinerator, a lot of the skids and stuff like 8 burnable stuff. 9 Q Even before the incinerator 10 A Yeah. 11 Q was Blaylock sending stuff? 12 A Yeah. We'd burn it. And theirs was 13 mostly garbage from grocery store chains and stuff like that. 14 like that. 15 Q They weren't a burning dump? 16 A No. 17 Q And you were? 18 A Yes. 19 Q So burnables they moved from their 20 they moved over to your dump? 21 A Right. 22 Q And does that go back to when you were little kid? 23 were a little kid? 24 A I'm pretty sure because over there 25 next to the dump they had a movie theater, a log D and what about - in addition to 5 burnables, what about industrial waste? Was that coming in from Blaylock? 3 Q Yead, what? 4 We got a lot of stuff from them. 4 Q Yeah, what? 5 Q Man-hrmn. 5 Q What about frequency? How often was it coming in from Coke? 6 A That's all I can think of at the moment. 6 Q And Yeah. 10 Q What about frequency? How often was it coming in from Coke? 8 A They would come maybe once a month maybe, something like that. 9 Q What size of loads were they coming in on? 14 Like that. 15 Q and you were? 15 A No. 16 Q Their own trucks or were they using like that. 17 Q And does that go back to when you were a little kid? 18 A Yes. 19 Q So burnables they moved from their 20they moved over to your dump? 21 A Right. 22 Q And does that go back to when you were little kid? 23 Q You don't remember. 24 A Right. 25 next to the dump they had a movie theater, and Dad when he'd take us he to the dump they had a movie theater and Dad when he'd take us he to the dump they had a movie theater. 24 A Yeah. 25 O Did you booter we he Blaylock trucks 26 A Yeah. 27 A Yeah. 28 A Yeah was the coming in You will be provided to the your series of the coming in You will be provided to your side? 29 A Yeah, what? 20 Q Hard's		Page 113		Page 115
2 Q To go to the Blaylock location? 3 A Right. 4 Q What kind of stuff didn't Blaylock 5 like that ended up where you were? 6 A Lots of cardboard. Since we had the incinerator, a lot of the skids and stuff like 7 incinerator, a lot of the skids and stuff like 9 Q Even before the incinerator— 10 A Yeah. 11 Q — was Blaylock sending stuff? 12 A Yeah. We go a lot of the burnable stuff. 12 A Yeah. We go a lot of stuff from them. 13 mostly garbage from grocery store chains and stuff? 14 like that. 15 Q They weren't a burning dump? 16 A No. 17 Q And you were? 18 A Yes. 19 Q So burnables they moved from their 20 — they moved over to your dump? 21 A Right. 22 Q And does that go back to when you 22 were a little kid? 23 were a little kid? 24 A I'm pretty sure because over there 25 he told us stories about that. 25 A Yeah, mh-mm. 26 Q And what about — in addition to burnables, what about industrial waste? Was that coming in from Blaylock? 25 A Yeah, mh-mm. 26 Q Here's one since you got a can right 1 in front of you. What about Coca-Cola? 27 A Yeah. 28 Q Yeah, what? 29 A Yeah, what? 21 A Yeah, what? 21 A Yeah, a We got a lot of stuff from them. 29 Q Hards one since you got a can right 1 in front of you. What about coca-Cola? 20 Q Hards one since you got a can right 1 in front of you. What about coca-Cola? 29 A Yeah, what? 20 Q Hards one since you got a can right 1 in front of you. What about Coca-Cola? 21 Q Hards one since you got a can right 2 in for cases of Coke. 22 Q Hards one since you got a can right 2 in for cases of Coke. 23 Q Yead on't remember Pepsi coming in Papa 1 that coming in from Blaylock? 24 A Yeah. 25 Corning in to your site? 26 A Yeah, what? 27 A Yeah. 28 Q Yeah, what? 29 A Yeah, what? 21 A Yeah. 21 Q Hards one since you got a can right 2 in for cases of Coke. 29 A Yeah, what? 21 Q Hards one since you got a can right 2 in for cases of Coke. 20 Q Hards one since you got a can right 2 in think. All the chicken parts would come in that. 29 Q Hards one since you got a can right 2 in think. All the chicken par	1	A Yeah.	1	paper boxes, and they'd dump big a whole bunch
4	2	Q To go to the Blaylock location?	2	
4	3		3	Q Anything else that you can think of?
6 A Lots of cardboard, Since we had the 7 incincrator, a lot of the skids and stuff like 8 burnable stuff. 9 Q Even before the incincrator— 10 A Yeah. 11 Q — was Blaylock sending stuff? 12 A Yeah, We'd burn it. And theirs was 13 mostly garbage from grocery store chains and stuff? 14 like that. 15 Q They weren't a burning dump? 16 A No. 17 Q And you were? 18 A Yes. 19 Q So burnables they moved from their 20 — they moved over to your dump? 21 A Right. 22 Q And does that go back to when you 23 were a little kid? 24 A L'm pretty sure because over there 25 next to the dump they had a movie theater, a 2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about — in addition to 7 burnables, what about industrial waste? Was that 8 coming in from of you. What about Coca-Cola? 17 A We got a lot of stuff from them. 18 Q Wat kind of stuff? 19 A We got a lot of stuff from them. 19 A We got a lot of stuff from them. 10 Q Here's one since you got a can right in front of you. What about Coca-Cola? 17 for cases of Coke. 18 Q Mmat was their connection to SDD? 19 A Yeah, 11 Grine of Yeak when you were a little kid? 20 Q All right. And what about their competitor, pepsi-Cola? 21 A Yeah, what? 22 A Yeah, what? 23 Q Did you observe the Blaylock trucks coming in to your site? 3 A Yeah, 3 Q Did you observe the Blaylock trucks coming in to your site? 4 A No. 2 Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. 3 A Right. 4 C They would go to Blaylock, the chicken parts would come in that. 4 C They would go to Blaylock, the chicken parts would come in that. 5 Q Man what about the container Service. 5 A We got a lot of their bottles, you know, ones that used to be— 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	4		4	A That's all I can think of at the
7	5		5	moment.
burnable stuff. Q Even before the incinerator A Yeah. Q was Blaylock sending stuff? A Yeah. We'd burn it. And theirs was mostly garbage from grocery store chains and stuff like that. C They weren't a burning dump? A No. C A A No. C A A Yes. Q Their own trucks or were they using on the most own trucks or were they using on the most own trucks or were they using on the state of the formation of the state of the formation of the state of the formation to state of the formation of the state, and Dad when he'd take us he told us stories about that. Q What size of loads were they coming in on? A I don't remember. A Coca-Cola emblem was on 'em, but I don't remember what Q Does this go back to when you were a little kid? A Yeah. Q All right. And what about their competitor, Pepsi-Cola? A No, hmm-mm. They were closer, I think, to Powell Road because they were up north. Page 114 drive-in movie theater, and Dad when he'd take us he told us stories about that. A Yeah. Q You don't remember. A No, hmm-mm. They were closer, I think, to Powell Road because they were up north. Page 114 drive-in movie theater, and Dad when he'd take us he told us stories about that. Q You don't have any memory of Pepsi coming in SDD? A No. So I don't think Q You don't have any memory of Pepsi coming in SDD? A No. So I don't think Q You don't have any memory of Pepsi coming in SDD? A No. So I don't think Q You don't have any memory of Pepsi coming in SDD? A No. So I don't think Q You don't have any memory of Pepsi coming in SDD? A Larry Brandon and another gentleman rant transpany before they were bought out by a Chiago-based outfit, and they would man any dump at Blaylock's because it was mostly garbage and stuff. Q Mah what about Coca-Cola for cases of Coke. Q What was their connection to SDD? Farms, I think. All the chicken parts would come in that. Q They would go to Blaylock, the chicken parts A Yeah. Q They would go to Blaylock, the chicken parts A Yeah. Q They would go to Blay	6	A Lots of cardboard. Since we had the	6	Q What about frequency? How often was
9 Q Even before the incincrator 10 A Yeah. We A Yeah. We'd burn it. And theirs was mostly garbage from grocery store chains and stuff like that. 12 A No. 15 Q They weren't a burning dump? 15 A Coca-Cola emblem was on 'em, but I don't remember what 17 Q And you were? 15 A Coca-Cola emblem was on 'em, but I don't remember what 18 Q They moved over to your dump? 16 A Yeah. 18 Uitle kid? 17 Q And does that go back to when you were a little kid? 18 A Right. 19 Q So burnables they moved from their 19 A Right. 19 A Yeah.	7	incinerator, a lot of the skids and stuff like	7	it coming in from Coke?
9 Q Even before the incincrator 10 A Yeah. We A Yeah. We'd burn it. And theirs was mostly garbage from grocery store chains and stuff like that. 12 A No. 15 Q They weren't a burning dump? 15 A Coca-Cola emblem was on 'em, but I don't remember what 17 Q And you were? 15 A Coca-Cola emblem was on 'em, but I don't remember what 18 Q They moved over to your dump? 16 A Yeah. 18 Uitle kid? 17 Q And does that go back to when you were a little kid? 18 A Right. 19 Q So burnables they moved from their 19 A Right. 19 A Yeah.	8		8	A They would come maybe once a month
11	9	Q Even before the incinerator	9	maybe, something like that.
12	10		10	Q What size of loads were they coming
13 mostly garbage from grocery store chains and stuff 14 like that. 15 Q They weren't a burning dump? 15 A Coca-Cola emblem was on 'em, but I don't remember what — 16 don't remember what — 17 Q Does this go back to when you were a 18 little kid? 19 Q So burnables they moved from their — they moved over to your dump? 20 — A Right. 21 Q And does that go back to when you 22 A I don't remember Pepsi coming in? 24 A I'm pretty sure because over there 23 Q You don't remember Pepsi coming in? 24 A I'm pretty sure because over there 25 mext to the dump they had a movie theater, a 25 mink, to Powell Road because they were up north. 26	11	Q was Blaylock sending stuff?	11	in on?
14 Ilke that. 15	12		12	A I don't remember.
15	13	mostly garbage from grocery store chains and stuff	13	Q Their own trucks or were they using
16		like that.	14	u=
17 Q And you were? 18 A Yes. 19 Q So burnables they moved from their 20 they moved over to your dump? 21 A Right. 22 Q And does that go back to when you 23 were a little kid? 24 A I'm pretty sure because over there 25 next to the dump they had a movie theater, a 25 next to the dump they had a movie theater, a 26 drive-in movie theater, and Dad when he'd take us 2 he told us stories about that. 2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 4 A Yeah, mm-hmm. 6 Q And what about — in addition to 5 burnables, what about industrial waste? Was that 6 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah, 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden — you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be — 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 26 Does this go back to when you little kid? 27 DA A Yeah. 29 Q All right. And what about their competitor, Pepsi-Cola? 21 A I don't remember. 22 A You don't remember Pepsi coming in? 24 A No, hmm-mm. They were loser, I think, to Powell Road because they were up north. 26 Page 114 27 Page 116 28 A You don't time. 29 Q You don't have any memory of Pepsi colar. 30 Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. 31 A Right. 32 Q Sol don't think — 33 Q Sol don't think — 4 No. 4 No. 4 No. 4 No. 4 No. 6 Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. 4 A Right. 4 No. 5 Q What was their connection to SDD? 5 Did they bring waste to your site? 6 A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was most	15	Q They weren't a burning dump?	15	A Coca-Cola emblem was on 'em, but I
18	16		16	don't remember what
18	17	Q And you were?	17	
20 they moved over to your dump? 21			ł	little kid?
21	19		-	
22 Q And does that go back to when you 23 were a little kid? 24 A I'm pretty sure because over there 25 next to the dump they had a movie theater, a Page 114 1 drive-in movie theater, and Dad when he'd take us 2 he told us stories about that. 2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 4 A No, hmm-mm. 5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right in front of you. What about Coca-Cola? 11 A Yeah. 12 A We got a lot of stuff? 13 Q Yeah, what? 14 A We got a lot of their bottles, you for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you how, ones that used to be 20 know, ones that used to be 21 Q A Two cents apiece. They would be chipped or something. They were damaged, and 22 A I don't remember. 24 A I don't remember. 25 A I don't trimember. 26 A No, hmm-mm. They were closer, 1 think, to Powell Road because they were up north. Page 116 Page 116 So I don't think 2 Q You don't have any memory of Pepsi coming in? A No. Q Since we're going in alphabetical order, you mentioned earlier today a hauling corder, yo	20	they moved over to your dump?	20	Q All right. And what about their
were a little kid? A I'm pretty sure because over there next to the dump they had a movie theater, a Page 114 drive-in movie theater, and Dad when he'd take us he told us stories about that. Q Did you observe the Blaylock trucks coming in to your site? A Yeah, mm-hmm. Q And what about — in addition to burnables, what about industrial waste? Was that coming in from Blaylock? A Yeah. Q Here's one since you got a can right in front of you. What about Coca-Cola? A Yeah, wat? A Yeah, wat? A We got a lot of stuff from them. Q What kind of stuff? A Wooden — you know, wooden Coca-Cola for cases of Coke. A We got a lot of their bottles, you know, ones that used to be — Q A Two cents apiece. They would be chipped or something. They were damaged, and Q Vou don't remember Pepsi coming in? A No, hmm-mm. They were closer, 1 think, to Powell Road because they were up north. Page 114 So I don't think — 2 Q You don't have any memory of Pepsi coming in? A No, hom-man. Page 116 So I don't think — 2 Q You don't have any memory of Pepsi coming in? A No. Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. A Right. Q What was their connection to SDD? Did they bring waste to your site? 1 A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. There was a couple chicken parts would come in that. Q They would go to Blaylock, the chicken parts — A Yeah. Q They would go to Blaylock, the chicken parts — A Yeah. Q Or They would go to Blaylock, the chicken parts — A Yeah. Q Or Yeah. A Yeah. Q Or Yeah. A Yeah. Q Or Yeah. A Yeah. Q Or You don't tremember Pepsi coming in? A No. Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. A Right. Page 116 A Right. A Right. A Larry Brandon and another gentleman ran that company before they were boug	21		21	competitor, Pepsi-Cola?
A I'm pretty sure because over there next to the dump they had a movie theater, a Page 114 drive-in movie theater, and Dad when he'd take us he told us stories about that. Day of the told us stories about that. A Yeah, mm-hmm. A Yeah, man-hmm. A Yeah, A We got a lot of stuff? A Wooden you know, wooden Coca-Cola for cases of Coke. A We got a lot of their bottles, you know, ones that used to be A We contiped or something. A Wo cents apiece. They would be contined to the dump they had a movie theater, a A No, hmm-mm. They were closer, I think, to Powell Road because they were up north. A No, lomm-mm. They were closer, I think, to Powell Road because they were up north. Page 114 A No, hmm-mm. They were closer, I think, to Powell Road because they were up north. Page 115 So I don't think Q You don't have any memory of Pepsi coming to SDD? A No. Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. A Right. Q What was their connection to SDD? Did they bring waste to your site? A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. There was a couple chicken packing places, Valley Farms, I think. All the chicken parts would come in that. Q They would go to Blaylock, the chicken parts A Yeah. Q They would go to Blaylock, the chicken parts A Yeah. Chicago-based outfit, and they would go to Blaylock, the chicken parts A Yeah. A Yeah. Chicken parts A Yeah. Chipped or something. They were damaged, and A Yeah. Chipped or something. They were damaged, and	22		22	A I don't remember.
25 next to the dump they had a movie theater, a 25 think, to Powell Road because they were up north.	23		23	Q You don't remember Pepsi coming in?
Page 114 drive-in movie theater, and Dad when he'd take us he told us stories about that. Q Did you observe the Blaylock trucks coming in to your site? A Yeah, mm-hmm. Durnables, what about industrial waste? Was that coming in from Blaylock? A I don't remember from them. D Q Here's one since you got a can right in front of you. What about Coca-Cola? A Yeah, what? A We got a lot of stuff? A Wooden you know, wooden Coca-Cola for cases of Coke. Q Ame know, ones that used to be Mow, ones that used to be Mow children and and when he'd take us So I don't think A No. Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. A Right. Q What was their connection to SDD? Did they bring waste to your site? A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. There was a couple chicken packing places, Valley Farms, I think. All the chicken parts would come in that. Q They would go to Blaylock, the chicken parts Mow cents apiece. They would be chicken packing. A Yeah. Q A no. Q Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. A Right. Q What was their connection to SDD? Did they bring waste to your site? A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. There was a couple chicken packing places, Valley Farms, I think. All the chicken parts would come in that. Q They would go to Blaylock, the chicken parts A Yeah. A Yeah. A We got a lot of their bottles, you know, ones that used to be A Yeah. A We don't have any memory of Pepsi A No. C Since we're going in alphabetical order, you mentioned earlier today a hauling Company named Container Service. A Right. Farry Inhant Al	24		24	A No, hmm-mm. They were closer, I
1 drive-in movie theater, and Dad when he'd take us 2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah, 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2	25	next to the dump they had a movie theater, a	25	think, to Powell Road because they were up north.
2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Q Vaud don't have any memory of Pepsi 3 coming to SDD? 4 A No. 5 Q Since we're going in alphabetical 6 order, you mentioned earlier today a hauling 6 company named Container Service. 8 A Right. 9 What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and		Page 114		Page 116
2 he told us stories about that. 3 Q Did you observe the Blaylock trucks 4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Q Vaud don't have any memory of Pepsi 3 coming to SDD? 4 A No. 5 Q Since we're going in alphabetical 6 order, you mentioned earlier today a hauling 6 company named Container Service. 8 A Right. 9 What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	1	drive-in movie theater, and Dad when he'd take us	1	So I don't think
3 Q Did you observe the Blaylock trucks 4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about — in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden — you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be — 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Coming to SDD? 4 A No. 6 Q Since we're going in alphabetical 6 order, you mentioned earlier today a hauling 7 company named Container Service. 8 A Right. 9 Q What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 A Yeah. 20 A Yeah. 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	1		I	
4 coming in to your site? 5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. 8 A Right. 9 Q What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman ran that company before they were bought out by a Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken parts would come in that. 18 Q They would go to Blaylock, the chicken parts 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	3		3	
5 A Yeah, mm-hmm. 6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Since we're going in alphabetical order, you mentioned earlier today a hauling company named Container Service. 8 A Right. 9 Q What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley Farms, I think. All the chicken parts would come in that. 18 Q They would go to Blaylock, the chicken parts 20 A Yeah. 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	4		4	
6 Q And what about in addition to 7 burnables, what about industrial waste? Was that 8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 ompany named Container Service. 8 A Right. 9 Q What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley Farms, I think. All the chicken parts would come in that. 18 Q They would go to Blaylock, the chicken parts 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 24 Oday.			į.	
burnables, what about industrial waste? Was that coming in from Blaylock? A I don't remember from them. Q Here's one since you got a can right in front of you. What about Coca-Cola? A Yeah, Q Yeah, what? A We got a lot of stuff from them. Q What kind of stuff? A Wooden you know, wooden Coca-Cola Remarks a We got a lot of their bottles, you Monday a We got a lot of their bottles, you A We got a lot of their bottles, you A We got a lot of their bottles, you A We got a lot of their bottles, you A We got a lot of their bottles, you A Two cents apiece. They would be Company named Container Service. A Right. Q What was their connection to SDD? Did they bring waste to your site? A Larry Brandon and another gentleman ran that company before they were bought out by a Chicago-based outfit, and they would mainly dump at Blaylock's because it was mostly garbage and stuff. There was a couple chicken parts would come in that. Q They would go to Blaylock, the chicken parts 20 know, ones that used to be 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and	ı		6	order, you mentioned earlier today a hauling
8 coming in from Blaylock? 9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 20 What was their connection to SDD? 20 What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Right. 9 Q What was their connection to SDD? 21 A Larry Brandon and another gentleman 22 ran that company before they were bought out by a 23 Chicago-based outfit, and they would mainly dump at 24 Blaylock's because it was mostly garbage and stuff. 25 There was a couple chicken parts would come 26 Farms, I think. All the chicken parts would come 27 in that. 28 Q They would go to Blaylock, the 29 Chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Chipped or something. They were damaged, and 24 A Right. 25 Q What was their connection to SDD?	1		1	
9 A I don't remember from them. 10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 19 C What was their connection to SDD? 10 Did they bring waste to your site? 11 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 for cases of Coke. 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 know, ones that used to be 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 24 A Yeah. 25 Q Okay.	8		1	
10 Q Here's one since you got a can right 11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 19 know, ones that used to be 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 2 Did they bring waste to your site? 11 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Chipped or something. They were damaged, and 24 Chicago-based outfit, and they would mainly dump at 25 Chicago-based outfit, and they would mainly dump at 26 Chicago-based outfit, and they would mainly dump at 27 Chicago-based outfit, and they would mainly dump at 28 Chicago-based outfit, and they would mainly dump at 29 Chicago-based outfit, and they would mainly dump at 20 Chicago-based outfit, and they would mainly dump at 21 D They was a couple chicken packing places, Valley 22 A Yeah. 23 Q They would go to Blaylock, the 24 Q or to you? 25 A Yeah. 26 Q Okay.	9		9	
11 in front of you. What about Coca-Cola? 12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 20 know, ones that used to be 20 A nickel or a penny? 21 A Larry Brandon and another gentleman 12 ran that company before they were bought out by a 13 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 24 Larry Brandon and another gentleman 25 ran that company before they were bought out by a 26 Chicago-based outfit, and they would mainly dump at 26 Practical Practi	10		10	
12 A Yeah. 13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 20 know, ones that used to be 20 Q A nickel or a penny? 21 Q A Two cents apiece. They would be 22 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 24 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 28 Q They would go to Blaylock, the 29 A Yeah. 20 A Yeah. 20 Q or to you? 20 A Yeah. 21 Q Okay.	11		į	
13 Q Yeah, what? 14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 21 Chicago-based outfit, and they would mainly dump at 14 Blaylock's because it was mostly garbage and stuff. 15 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Chicago-based outfit, and they would mainly dump at 24 Blaylock's because it was mostly garbage and stuff. 25 There was a couple chicken packing places, Valley 26 Farms, I think. All the chicken parts would come 27 in that. 28 Q They would go to Blaylock, the 29 A Yeah. 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Chicago-based outfit, and they would mainly dump at 24 Blaylock's because it was mostly garbage and stuff. 26 A Yeah Slaylock's because it was mostly garbage and stuff. 26 A Wooden you know, wooden Coca-Cola 27 There was a couple chicken packing places, Valley 28 Farms, I think. All the chicken parts would come 29 A Yeah. 20 A Yeah. 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Chicago-based outfit, and they would mainly dump at 24 Blaylock's because it was mostly garbage and stuff. 26 A Wooden you know, wooden Coca-Cola 29 A Yeah. 20 A Yeah. 20 Okay.	12	· · · · · · · · · · · · · · · · · · ·	12	
14 A We got a lot of stuff from them. 15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 21 Blaylock's because it was mostly garbage and stuff. 25 There was a couple chicken packing places, Valley 26 Farms, I think. All the chicken parts would come 27 in that. 28 Q They would go to Blaylock, the 29 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Q Okay.	13		13	
15 Q What kind of stuff? 16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 21 There was a couple chicken packing places, Valley 16 Farms, I think. All the chicken parts would come 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Okay.	1		14	
16 A Wooden you know, wooden Coca-Cola 17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 21 G Okay. 22 A Wooden you know, wooden Coca-Cola 25 Farms, I think. All the chicken parts would come 26 in that. 27 Chicken parts 28 Chicken parts 29 A Yeah. 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Okay.	15		15	
17 for cases of Coke. 18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 17 in that. 18 Q They would go to Blaylock, the 19 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Q Okay.	16	•	1	
18 Q Mm-hmm. 19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 21 Q C They would go to Blaylock, the 29 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Q Okay.		· · · · · · · · · · · · · · · · · · ·	1	
19 A We got a lot of their bottles, you 20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 29 chicken parts 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Q Okay.	18		18	
20 know, ones that used to be 21 Q A nickel or a penny? 22 A Two cents apiece. They would be 23 chipped or something. They were damaged, and 20 A Yeah. 21 Q or to you? 22 A Yeah. 23 Q Okay.	19	A We got a lot of their bottles, you	19	
22 A Two cents apiece. They would be 22 A Yeah. 23 chipped or something. They were damaged, and 23 Q Okay.	20		20	•
22 A Two cents apiece. They would be 22 A Yeah. 23 chipped or something. They were damaged, and 23 Q Okay.	21	Q A nickel or a penny?	21	Q or to you?
23 chipped or something. They were damaged, and 23 Q Okay.	22		22	
	23		23	Q Okay.
	24		24	
there would be cartons of syrup would come in like 25 Container Service. Container Service was more the	25		25	Container Service. Container Service was more the